

Regarding RM-10413: ARRL refarming proposal for the Novice band

I do not believe the ARRL has gone far enough. The ARRL proposal discusses "extremely popular PSK-31", "underutilized Novice HF subbands cannot wait longer and must proceed now", "urgent and critical", "because they would be interacting in all portions thereof with higher class licenses", and "ARRL believes that conversion to digital communications technologies in the Amateur Service is a critically important component of the future of Amateur HF communications. This conversion will be necessary in order to accommodate growth in the service and extension of Amateur leadership in the development and refinement of digital communications technology."

ARRL then talks about telegraphy for 80, 40 and 15 meters for the same people they are refarming the frequencies around. This seems to contradict what they are striving for.

I ask the FCC to consider modifying the ARRL proposal slightly and allow Novice and Techs CW, RTTY and data privileges on 25Khz of the 80, 40 and 15 meters bands at the upper end of the CW only segment. This will allow the Novice and Tech amateurs to expand their knowledge in the digital modes and not be stuck on 10 meters which varies widely with the sun spot cycles. 25Khz is a very small segment of bandwidth but it can help accomplish what the ARRL talks about in their proposal but does not strive for.

At some point in time, if the FCC decides to drop the 5 WPM requirement for HF privileges, there will already be an HF segment that the VHF+ Techs will be allowed to use. This will allow the FCC breathing room before the next wave of refarming requests come in.

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